

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC
This document relates to the cases listed on the Exhibit attached hereto.	<b>STIPULATION OF DISMISSAL WITHOUT PREJUDICE</b>

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Debra J. Humphrey

Debra J Humphrey  
Marc J Bern & Associates LLP  
60 E 42nd St., Ste. 950  
New York, NY 10165  
212-702-5000  
212-818-0164 (fax)  
dhumphrey@bernllp.com

**ATTORNEY FOR PLAINTIFFS**

s/ Richard B. North, Jr.

Richard B. North, Jr.  
richard.north@nelsonmullins.com  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
201 17<sup>th</sup> St. NW, Ste. 1700  
Atlanta, GA 30363  
P: 404.322.6000  
F: 404.332.6397

**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 1, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Debra J. Humphrey

Debra J Humphrey

## EXHIBIT "A"

<b>Member Case Number</b>	<b>Full Name of Plaintiff</b>	<b>Date Answer Filed (If applicable)</b>
2:19-cv-03980-DGC	Michael Finui	
2:17-cv-01531-DGC	Bryce Fisher	
2:17-cv-04468-DGC	Dorothy Foertsch	
2:17-cv-03231-DGC	Henrietta Frierson	
2:17-cv-04062-DGC	Georgia Frierson	
2:17-cv-03277-DGC	Darlene Gage	
2:17-cv-03173-DGC	Ksanders Gamble	
2:18-cv-03340-DGC	Marsha Gamble	
2:17-cv-03309-DGC	Joann Games	
2:17-cv-04084-DGC	Reita Gaston	
2:18-cv-01452-DGC	Beverly Gibson	
2:17-cv-04484-DGC	Donna Goode	
2:17-cv-03216-DGC	James Gordon	
2:17-cv-04114-DGC	Mark Gore	
2:17-cv-04012-DGC	JaHazel Grayson	
2:17-cv-04010-DGC	Rebecca Hall	
2:17-cv-04190-DGC	Shrell Harris	
2:17-cv-03259-DGC	Sandra Hawkins	
2:19-cv-03996-DGC	Martha Holloway	